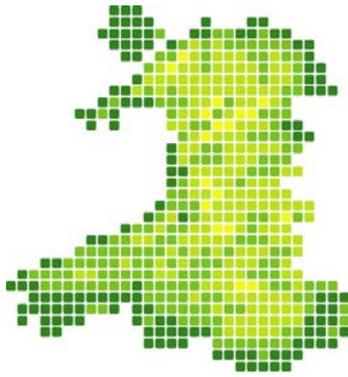


LOCAL GOVERNMENT BOUNDARY COMMISSION FOR WALES



Comisiwn Ffiniau
Llywodraeth Leol
i Gymru



Local Government
Boundary Commission
for Wales

**REVIEW OF ELECTORAL ARRANGEMENTS
REPORT AND PROPOSALS**

COUNTY BOROUGH OF MERTHYR TYDFIL

LOCAL GOVERNMENT BOUNDARY COMMISSION FOR WALES

REVIEW OF ELECTORAL ARRANGEMENTS FOR THE COUNTY BOROUGH OF MERTHYR TYDFIL

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The Local Government Boundary Commission for Wales
Caradog House
1-6 St Andrews Place
CARDIFF
CF10 3BE

Tel Number: (029) 2039 5031
Fax Number: (029) 2039 5250
E-mail lgbc.wales@wales.gsi.gov.uk
www.lgbc-wales.gov.uk



FOREWORD

This is our report containing our Final Proposals for Merthyr Tydfil County Borough Council.

In January 2009, the Local Government Minister, Dr Brian Gibbons asked this Commission to review the electoral arrangements in each principal local authority in Wales. Dr Gibbons said:

“Conducting regular reviews of the electoral arrangements in each Council in Wales is part of the Commission’s remit. The aim is to try and restore a fairly even spread of councillors across the local population. It is not about local government reorganisation.

Since the last reviews were conducted new communities have been created in some areas and there have been shifts in population in others. This means that in some areas there is now an imbalance in the number of electors that councillors represent.

The Commission will review the total number of councillors making up each council; the number of councillors representing each electoral division and the name and boundary of each division.

As far as possible, I want to restore fairness so that councillors generally represent the same number of people.” [13 January 2009].

This issue of fairness is set out clearly in the legislation and has been a key principle for our work. The situation which currently exists, where a councillor from one part of the County Borough represents a small number of voters whereas another Councillor may represent many, many more is simply not fair on electors. In practical terms, it means that some areas have an unfair advantage over others in decisions made in the council chamber.

Putting this right is far from simple given the constraints against which the Commission must operate. We cannot just move lines on the map; we have to adhere to existing “building blocks”, which are the Community Areas and Community Wards which cover the whole of Wales. Sometimes, these do not reflect the current patterns of community life in Wales but, even where this is the case, we have not been able to accept suggestions which cut across these boundaries. This is frustrating for both respondents and the Commission.

We are also required to look to the future and have asked the council to give us predictions of the number of electors in 5 years time. At the best of times this would be challenging but, in the current economic climate, it is particularly difficult.

The publication of our first few draft proposals reports drew some concern that we were moving away from the principle of having one councillor for an electoral division to suggesting far greater use of multi member divisions. The Rules within which we operate envisage that each electoral division shall be represented by one councillor; this could be called the “default position”. However, we can move away from this for a variety of reasons, including where we have found this is the best way of ensuring that electors are more equally represented.

In working up our proposals, we have tried to cater for local ties and those who wish to retain current boundaries. We have looked carefully at every representation made to us. However, we have had to balance these issues and representations against all the other factors we have to consider and the constraints set out above. In particular, the requirement for electoral parity, democratic fairness for all electors, is the dominant factor in law and this is what we have tried to apply. We believe that greater fairness, along with other proposals in our report, will lead to local government which is effective and convenient.

Finally, may I thank the Members and officers of the Principal authority for their assistance in our work, the community and town councils for their contribution and last but most importantly, the ordinary citizens who have taken the time and trouble to make comments and suggestions.

Paul Wood
Chairman

**Mr Carl Sargeant
Minister for Social Justice and Local Government
Welsh Assembly Government**

REVIEW OF ELECTORAL ARRANGEMENTS FOR THE COUNTY BOROUGH OF MERTHYR TYDFIL

REPORT AND PROPOSALS

1. INTRODUCTION

- 1.1 In accordance with the directions issued by the Minister on 13 January 2009, we, the Local Government Boundary Commission for Wales (the Commission), have completed the review of electoral arrangements for the County Borough of Merthyr Tydfil and present our Final Proposals for the future electoral arrangements. A glossary of terms used in this report can be found at Appendix 1. In 2009 the County Borough of Merthyr Tydfil had an electorate of 41,310. At present it is divided into 11 divisions returning 33 councillors. The average ratio of members to electors for the County Borough is currently 1:1,252. The present electoral arrangements are set out in detail in Appendix 2.

2. SUMMARY OF PROPOSALS

- 2.1 We propose a reduction in the council size from 33 to 32 elected members. Having taken into account the small number of communities, number of electors and the topography that all limit the available options for changes to the electoral arrangements for the County Borough of Merthyr Tydfil, we propose a minor change to the arrangement in the Gurnos electoral division that will achieve an improvement in the level of electoral parity across the County Borough of Merthyr Tydfil.

3. SCOPE AND OBJECT OF THE REVIEW

- 3.1 Section 57 of the Local Government Act 1972 (the 1972 Act) lays upon the Commission the duty, at intervals of not less than 10 and not more than fifteen years, to review the electoral arrangements for every principal area in Wales for the purpose of considering whether or not to make proposals to the Welsh Assembly Government for a change in those electoral arrangements.
- 3.2 The Minister for Social Justice and Local Government of the Welsh Assembly Government has directed the Commission to submit a report in respect of the review of electoral arrangements for the County Borough of Merthyr Tydfil by 30 June 2011.

Electoral Arrangements

3.3 The “electoral arrangements” of a principal area are defined in section 78 of the Act as:

- i) the total number of councillors to be elected to the council;
- ii) the number and boundaries of electoral divisions;
- iii) the number of councillors to be elected for each electoral division; and
- iv) the name of any electoral division.

Rules to Be Observed Considering Electoral Arrangements

3.4 We are required by section 78 to comply, so far as is reasonably practicable, with the rules set out in Schedule 11 to the Act. These require the Commission to provide for there to be a single member for each electoral division. However, the Welsh Assembly Government may direct the Commission to consider the desirability of providing for multi-member electoral divisions for the whole or part of a principal area.

3.5 The rules also require that:

Having regard to any change in the number or distribution of local government electors of the principal area likely to take place within the period of five years immediately following consideration of the electoral arrangements:

- i) subject to paragraph (ii), the number of local government electors shall be, as nearly as may be, the same in every electoral division in the principal area;
- ii) where there are one or more multi-member divisions, the ratio of the number of local government electors to the number of councillors to be elected shall be, as nearly as may be, the same in every electoral division in the principal area (including any that are not multi-member divisions);
- iii) every ward of a community having a community council (whether separate or common) shall lie wholly within a single electoral division; and
- iv) every community which is not divided into community wards shall lie wholly within a single electoral division.

In considering the electoral arrangements we must have regard to (a) the desirability of fixing boundaries which are and will remain easily identifiable; and (b) any local ties which would be broken by the fixing of any particular boundary.

Minister's Directions

- 3.6 The Minister has directed that the Commission shall consider the desirability of multi member electoral divisions in each county and county borough council in Wales.
- 3.7 The Minister has also given the following directions to the Commission for their guidance in conducting the review:
- (a) it is considered that a minimum number of 30 councillors is required for the proper management of the affairs of a county or county borough council;
 - (b) it is considered that, in order to minimise the risk of a county council or a county borough council becoming unwieldy and difficult to manage, a maximum number of 75 councillors is ordinarily required for the proper management of the affairs of a county or a county borough council;
 - (c) it is considered that the aim should be to achieve electoral divisions with a councillor to electorate ratio no lower than 1:1,750;
 - (d) it is considered that decisions to alter the existing pattern of multi and single member electoral divisions should only be taken where such proposals for alteration are broadly supported by the electorate in so far as their views can be obtained in fulfilment of the consultation requirement contained in Section 60 of the Act; and
 - (e) It is considered that the Commission shall, when conducting reviews under Part 4 of the Act, comply with paragraph 1A of Schedule 11 to the Act that is, the Rules.

The full text of the Directions is at Appendix 4. The Directions were further confirmed in a letter from the Minister on 12 May 2009. A copy of this letter follows the Directions at Appendix 4.

Local Government Changes

- 3.8 Since the last review of electoral arrangements there has been one change to local government boundaries in Merthyr Tydfil: the Merthyr Tydfil and Powys (Areas) Order 2009 made a minor change to the Vaynor electoral division.

Procedure

- 3.9 Section 60 of the Act lays down procedural guidelines which are to be followed in carrying out a review. In compliance with Section 60 of the Act we wrote on 16 September 2009 to Merthyr Tydfil County Borough Council, all the community councils in the area, the Member of Parliament for the local constituency, the Assembly Members for the area and other interested parties to inform them of our intention to conduct the review, to request their preliminary views and to provide a copy of the Welsh Assembly Government's directions to the Commission. We invited the County Borough Council to submit a suggested scheme or schemes for

new electoral arrangements. We also publicised our intention to conduct the review in local newspapers circulating in the County Borough and asked Merthyr Tydfil County Borough Council to display a number of public notices in their area. We also made available copies of our electoral reviews guidance booklet. In addition we made a presentation to both City and Community councillors explaining the review process.

4. DRAFT PROPOSALS

- 4.1 Prior to the formulation of our draft proposals we received representations from; Mr Michael German AM; two councillors; and one other interested body. These representations were taken into consideration and summarised in our Draft Proposals published on 10 May 2010. The following is a summary of our Draft Proposals.

Gurnos

- 4.2 The Gurnos electoral division consists of the Community of Gurnos (3,169 electors, 3,187 projected) represented by four councillors (792 electors per councillor) which is 37% below the current county average of 1,252 electors per councillor and is 55% below 1,750 electors per councillor.
- 4.3 In our Draft Proposals report we noted that the Gurnos is an area of high social and economic deprivation. We also noted the representations that suggest that the Gurnos electoral division be represented by three councillors, rather than the four currently. We took these views into account and considered it desirable to change the electoral arrangements in order to achieve improvements in electoral parity.
- 4.4 In our Draft Proposals report we considered reducing the number of councillors within the Community of Gurnos from four to three which would result in a level of representation of 1,056 electors (1,062 projected) per councillor which is 18% below the proposed county average of 1,291 (1,297 projected) electors per councillor improving electoral parity while continuing to give a level of representation still substantially more generous within the county.
- 4.5 We considered the electoral arrangements of the existing electoral divisions of Bedlinog, Cyfarthfa, Dowlais, Merthyr Vale, Park, Penydarren, Plymouth, Town, Treharris and Vaynor and the ratio of local government electors to the number of councillors to be elected and we propose that the existing arrangements should continue.
- 4.6 Our Draft Proposals recommended a reduction in the council size from 33 to 32 elected members. We considered that these arrangements provide for effective and convenient local government and met in principle the directions provided by the Welsh Assembly Government.
- 4.7 Copies of the Draft Proposals were sent to all the councils, bodies and individuals referred to in paragraph 3.9 seeking their views. A copy was also sent to anyone who had submitted preliminary comments. By public notice we also invited any

other organisation or person with an interest in the review to submit their views. Copies of the Draft Proposals were made available for inspection at the offices of Merthyr Tydfil County Borough Council and the Commission.

5. REPRESENTATIONS RECEIVED IN RESPONSE TO THE DRAFT PROPOSALS

- 5.1 In response to our Draft Proposals report we received a representation from Merthyr Tydfil County Borough Council. A summary of these representations can be found at Appendix 5.

6. ASSESSMENT

Council Size

- 6.1 At present the size of the council at 33 members is within the numerical limits advised in the Minister's direction. The current member to electorate ratio for the council is 1:1,252 which is 28% below 1,750 electors per councillor (see Councillor to electorate ratio below). There are currently 11 multi-member divisions out of a total of 11 electoral divisions.
- 6.2 We reviewed the electoral arrangements for the County Borough of Merthyr Tydfil in the light of the Welsh Assembly Government's directions for our guidance and took account of the representations which had been made to us. In our deliberations we considered the ratio of the number of local government electors to the number of councillors to be elected, with a view to ensuring that the number of local government electors shall be, as nearly as may be, the same in every division in the principal area. We looked at the present multi-member divisions to consider if we should recommend the creation of single member divisions. We considered the size and character of the authority and a wide range of other factors including population density, the local topography, road communications and local ties.
- 6.3 For the reasons given below we believe that in the interests of effective and convenient local government a council size of 32 would be appropriate to represent the County Borough of Merthyr Tydfil. This determination of the council size results in an average of 1,291 electors being represented by each councillor.

Councillor to electorate ratio

- 6.4 The Minister's directions include the following at 3.7 (a): "It is considered that the aim should be to achieve electoral divisions with a councillor to electorate ratio no lower than 1:1,750." The Minister has indicated to the Commission that this means that the number of electors per councillor should not normally fall below 1,750, and this is how the Commission has interpreted and applied the Direction. We bear very much in mind that the directions are provided as guidance and should not be applied without regard to the special circumstances of the particular area: there may well be circumstances, having to do with topography or population etc of the area where it will be considered that an electoral division of fewer than 1,750

electors to be represented by each councillor is appropriate. This was explained in the letter from the Minister (Appendix 4) which stated: "This means that the ratio remains as the aim to be worked towards and not as a goal to be achieved in each case. In doing so attention should be paid to local communities having their own identifiable representation even where the indicative figure of 1,750 electors/councillor is not always achievable". In the absence of special circumstances we will aim to propose electoral arrangements in which the level of representation does not fall below 1,750 electors per councillor. We are not constrained in the same way by this direction from proposing electoral arrangement in which the number of electors to be represented by each councillor is, in appropriate cases, higher than 1,750. In this review our ability to achieve a significant movement towards 1,750 electors per councillor has been constrained by the existing size of the Council which at 33 members is already close to the minimum number considered in the Minister's directions (see 3.7(a) above).

Number of Electors

- 6.5 The numbers shown in Appendix 2 as the electorate for 2009 and the estimates for the electorate in the year 2014 are those submitted to us by Merthyr Tydfil County Borough Council.

Electoral Divisions

- 6.6 We have considered the boundaries of the existing electoral divisions of Bedlinog, Cyfarthfa, Dowlais, Merthyr Vale, Park, Penydarren, Plymouth, Town, Treharris and Vaynor and the ratio and number of local government electors to the number of councillors to be elected and we propose that the existing arrangements should continue. We considered change to the remaining electoral division. Details of the current electoral arrangements for the area can be found at Appendix 2.
- 6.7 In the following section the proposal for the new Electoral Divisions is laid out in the same way. The first part of the initial paragraph gives a historical context by listing all the existing Electoral Divisions or their component parts used to construct each proposed Electoral Division. These components - the Communities and Community Wards - are described as a complete Community together with its current and projected electorates if it was used as such. If only part of a Community is used - ie a Community Ward - then the name of that Community Ward, its electorate figures, and the name of its Community will be shown as such. The final part of that paragraph then lists the component parts of the proposed new Electoral Division in the same way - either as whole Communities with current and projected electorates, or as a named Community Ward, its electorate figures and the name of its Community - as before. This method of describing the make-up of Electoral Divisions is also used in the tables at Appendix 2 and 3.

Gurnos

- 6.8 The existing Gurnos electoral division consists of the Community of Gurnos 3,169 electors (3,187 projected) and returns four members with a level of representation of 792 electors per councillor which is 37% below the existing county average of 1,252. In our Draft Proposals report we proposed reducing the number of

councillors within the Community of Gurnos from four to three, resulting in a level of representation of 1,056 electors per councillor which was 18% below the Draft Proposals county average of 1,291 electors per councillor.

- 6.9 We received no objections to this proposal, with the only representation received being from Merthyr Tydfil County Borough Council who stated they were content with the Draft Proposal.
- 6.10 This proposal achieves a significant improvement in electoral parity in the area, and we also take into account the support given to this proposal by the County Borough Council's (and the lack of any representation against it). We therefore conclude that the proposed change would be desirable in the interests of effective and convenient local government and we confirm it as our proposal for the area. We propose that the electoral division retain the name **Gurnos**.

Summary of Proposed Arrangements

- 6.11 The proposed electoral arrangements (as shown at Appendix 3) provide a level of parity that ranges from 18% below to 23% above the proposed county average of 1,291 electors per councillor (based on the existing electoral figures). 4 (36%) of the electoral divisions have levels of representation more than 10% above or below the proposed county average of 1,291 electors per councillor and the remaining 7 (64%) all less than 10% above or below the proposed county average of 1,291 electors per councillor. This compares with the existing electoral arrangements (as shown at Appendix 2) where the level of parity ranges from 37% below to 27% above the current county average of 1,252 electors per councillor. 3 electoral divisions (27%) having levels of representation more than 25% above or below the current county average of 1,252 electors per councillor, 1 (9%) electoral divisions having levels of representation between 10% and 25% above or below than the current county average of 1,252 electors per councillor and the remaining 7 (64%) electoral divisions having levels of representation less than 10% above or below the current county average of 1,252 electors per councillor.

7. PROPOSALS

- 7.1 We propose a council of 32 members and 11 electoral divisions as set out in Appendix 3. For purposes of comparison the present electoral arrangements for the County Borough are given at Appendix 2. The boundaries of the proposed electoral divisions are shown by continuous yellow lines on the map placed on deposit with this Report at the Offices of Merthyr Tydfil County Borough Council and the Office of the Commission in Cardiff.

8. ACKNOWLEDGEMENTS

- 8.1 We wish to express our gratitude to the principal council and all the community councils for their assistance during the course of the review and to all bodies and persons who made representations to us.

9. RESPONSES TO THIS REPORT

- 9.1 Having completed our review of the County Borough of Merthyr Tydfil and submitted our recommendations to the Welsh Assembly Government on the future electoral arrangements for the principal authority, we have fulfilled our statutory obligation under the directions issued by the Welsh Assembly Government.
- 9.2 It now falls to the Welsh Assembly Government, if it thinks fit, to give effect to these proposals either as submitted by the Commission or with modifications, and if the Welsh Assembly Government decides to give effect to these proposals with modifications, it may direct the Commission to conduct a further review.
- 9.3 Any further representations concerning the matters in the report should be addressed to the Welsh Assembly Government. They should be made as soon as possible, and in any event not later than six weeks from the date that the Commission's recommendations are submitted to the Welsh Assembly Government. Representations should be addressed to:

Democracy Team
Local Government Policy Division
Welsh Assembly Government
Cathays Park
Cardiff
CF10 3NQ

MR P J WOOD (Chairman)

REV. HYWEL MEREDYDD DAVIES BD (Deputy Chairman)

Mr D J BADER (Member)

E H LEWIS BSc. DPM FRSA FCIPD (Secretary)

September 2010

GLOSSARY OF TERMS USED IN THIS REPORT

<i>Commission</i>	The Local Government Boundary Commission for Wales
<i>Council size</i>	The number of councillors elected to the council
<i>Directions</i>	Directions issued to the Commission by the Government under Section 59 of the 1972 Act
<i>Electoral arrangements</i>	How many Councillors there should be on the council of local government area, the parts into which the area should be divided for the purpose of electing councillors, the number of councillors for each electoral division, and the name of any electoral area
<i>Electoral Divisions</i>	The divisions into which principal areas are divided for the purpose of electing councillors, sometimes referred to colloquially as wards
<i>Electoral Review</i>	A review in which the Commission considers electoral arrangements for a local government area
<i>Electorate</i>	The number of persons entitled to vote in a local government area
<i>Electoral parity</i>	The principle that votes within a principal area should carry equal weight, measured by a comparison between an electoral division and the county average of the number of electors represented by a single councillor.
<i>Government</i>	The Welsh Assembly Government
<i>Interested person</i>	Person or body who has an interest in the outcome of an electoral review such as the principal council concerned, local MPs, AMs and political parties, community and town councils
<i>Multi member Division</i>	Electoral division within a principal area represented by more than one councillor
<i>Order</i>	Order made by the Government, giving effect to the proposals of the Commission, either as submitted or with modifications
<i>Principal area</i>	The area governed by a principal council: in Wales, a County or County Borough
<i>Principal council</i>	In Wales, one of the unitary authorities: a County or County Borough council

<i>Projected electorate</i>	The five-year forecast of the number of electors provided by the Council for the area under review
<i>Respondent</i>	Body or individual person who responds to the Commission's consultation by making representations or suggesting alternative proposals
<i>Rules</i>	Rules to be observed by the Commission in considering electoral arrangements
<i>Single member division</i>	Electoral division of a principal authority represented by one councillor
<i>The 1972 Act</i>	The Local Government Act 1972 as amended by the 1994 Act
<i>The 1994 Act</i>	The Local Government (Wales) Act 1994
<i>Unitary authority</i>	A principal council - the single tier organ of local government, responsible for all or almost all local government functions within its area, which in Wales replaced the two tier system of county councils and district councils: a County Council, or a County Borough Council
<i>Wards</i>	The electoral areas of Community Councils (not all Community Council areas are warded). The term is also used to describe the principal council electoral divisions

 SUBORDINATE LEGISLATION

2009 NO. 2

LOCAL GOVERNMENT ACT 1972

Directions to the Local Government Boundary Commission for
Wales 2009

Made 2009

Coming into force 2009

The Welsh Ministers, in exercise of the powers conferred on the Secretary of State by section 59 (1) of the Local Government Act 1972⁽¹⁾ and now vested in them ⁽²⁾ make the following Directions:

Title, commencement and application

1.—(1) The title of these Directions is the Directions to the Local Government Boundary Commission for Wales 2009.

(2) These Directions come into force on the day after the day on which they are made.

(3) These Directions are given to the Local Government Boundary Commission for Wales and apply in relation to Wales.

Interpretation

2. In these Directions—

“the Act” means the Local Government Act 1972; and

“the Commission” means the Local Government Boundary Commission for Wales.

Multi Member Divisions

3.—(1) Pursuant to paragraph 1A(3) of Schedule 11 to the Act ⁽³⁾ the Welsh Ministers direct that the Commission shall consider the desirability of multi member electoral divisions in each county council and county borough council ⁽⁴⁾ in the principal areas in Wales mentioned in section 20, Schedule 4 of the Act.

(1) 1972 c. 70.

(2) By virtue of the National Assembly for Wales (Transfer of Functions) Order 1999 (S.I. 1999/672) and paragraph 30(1) and 2 (a) of Schedule 11 to the Government of Wales Act 2006.

(3) as inserted by section 7(3) of the Local Government (Wales) Act 1994.

(4) as referred to in the Local Government Act 1972, section 20, Schedule 4, substituted by the Local Government (Wales) Act 1994, section 1 (2), Schedule 1, paragraph 2.

Review of electoral arrangements

4.—(1) Pursuant to section 59 (1) of the Act the Welsh Ministers give the following directions to the Commission for their guidance in conducting the review of electoral arrangements which they are required to carry out under section 55 of the Act—

- (a) It is considered that a minimum number of 30 councillors is required for the proper management of the affairs of a county or a county borough council;
- (b) It is considered that, in order to minimise the risk of a county council or a county borough council becoming unwieldy and difficult to manage, a maximum number of 75 councillors is ordinarily required for the proper management of the affairs of a county or a county borough council;
- (c) It is considered that the aim should be to achieve electoral divisions with a councillor to electorate ratio no lower than 1:1750;
- (d) It is considered that a decision to alter the existing pattern of multi and single member divisions in the areas referred to in paragraph 3 of these Directions should only be taken where such proposals for alteration are broadly supported by the electorate so far as their views can be obtained in fulfilment of the consultation requirement contained in section 60 of the Act;
- (e) It is considered that the Commission shall, when conducting reviews under Part 4 of the Act, comply with paragraph 1A of Schedule 11 to the Act and these Directions.

Reports of the review of electoral arrangements

5.—(1) Pursuant to section 58(1) of the Act the Welsh Ministers direct that reports prepared by the Commission in respect of the review of electoral arrangements in relation to county and county borough councils in Wales shall be submitted to the Welsh Ministers by no later than 30 June 2011.



Signed by the Minister for Social Justice and Local Government

Date 13 / 1 / 2009

Brian Gibbons AC/AM
Y Gweinidog dros Gyfiawnder Cymdeithasol a Llywodraeth
Leol
Minister for Social Justice and Local Government



Llywodraeth Cynulliad Cymru
Welsh Assembly Government

Eich cyf/Your ref
Ein cyf/Our ref MB/BG/291/09

Paul Wood
Chair
Local Government Boundary
Commission for Wales
Caradog House
1-6 St Andrews Place
Cardiff
CF10 3BE

12th May 2009

Dear Paul,

Directions on Reviews of Electoral Arrangements

I am aware that you have now commenced preliminary work on the cycle of reviews of electoral arrangements in each of the principal councils. Representations I have received from local government suggest to me that you may have interpreted my directions as being more prescriptive than those issued by the Secretary of State for Wales in 1995 prior to the last review cycle. I want to make clear that this is not the case.

The directions are issued for your guidance and are not to be viewed as instructions. In a number of respects – notably, in relation to the areas appropriate for multi-member divisions and the timetable – the last directions were more prescriptive but in relation to the central issue of the councillor to elector ratio the wording is identical. This means that the ratio remains as the aim to be worked towards and not as a goal to be achieved in each case. In doing so attention should be paid to local communities having their own identifiable representation even where the indicative figure of 1750 electors/councillor is not always achievable.

I do, of course, recognise that since 1995 we have seen the introduction of executive or alternative arrangements in principal councils, which may have implications for the number of councillors required to make a council fully functional. The 1995 directions were also introduced at a time of reorganisation, in a different political atmosphere from now.

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1NA

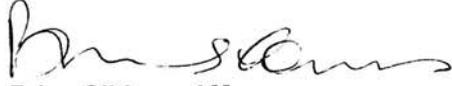
English Enquiry Line 0845 010 3300
Llinell Ymholiadau Cymraeg 0845 010 4400
Ffacs • Fax 029 2089 8522
Correspondence, Brian.Gibbons@Wales.gsi.gov.uk
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Wedi'i argraffu ar bapur wedi'i ailgylchu (100%)

Finally, I should also point out the stipulation in Schedule 11 of the Local Government Act 1972, that regard should be had to the need to fix boundaries which are easily identifiable and which recognise local community ties.

I wish you well in the review process.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Brian Gibbons', written in a cursive style.

Brian Gibbons AM

**SUMMARY OF REPRESENTATIONS RECEIVED IN RESPONSE TO DRAFT
PROPOSALS**

Merthyr Tydfil County Council / Gareth Chapman, Deputy Chief Executive wrote that the authority was content with the draft proposals relating to the future electoral arrangements for the County.